

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Richmond Division)**

MICHAEL PELLIS ARCHITECTURE PLC,	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 3:22-cv-00470
v.	)	
	)	
M.L. BELL CONSTRUCTION LLC, et al.	)	
	)	
Defendants.	)	

**MEMORANDUM IN SUPPORT OF MOTION TO EXTEND TIME  
FOR FILING A RESPONSE TO THE COMPLAINT**

Pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and Local Rule 7(F)(1) of the Local Rules of the Eastern District of Virginia, the Defendants, by counsel, and joined by Plaintiff, hereby move for an extension of the deadline to file their response to the Complaint. In support of this motion, the Defendants state as follows:

1. Plaintiff filed its Complaint on July 1, 2022, bringing claims against Defendants for copyright infringement fraud, common law trespass to chattels, and injunctive relief in the form of indemnity.
2. The Complaint was served on or about July 5, 2022. An answer or other response under Rule 12 is due by July 26, 2022.
3. The Defendants retained Dana J. Finberg and James W. Walker as their counsel on July 7, 2022. Mr. Finberg is current out of the country will not return until for another two weeks. Mr. Finberg's practice focusses on intellectual property litigation, including copyright infringement actions and related claims. Mr. Walker represents the Defendants on other

matters. Mr. Walker will be in depositions in another matter pending in this division (Civil Action No. 3:21-cv-00568) almost every weekday day from July 12 until August 4.

4. Plaintiff's claims are substantial and complicated.
5. To allow sufficient time to review the facts of the matter, the applicable law, and prepare an appropriate response to the Complaint, counsel requests an extension of time so that the Defendants' Answer and any other responsive motions, pleas or pleadings would be due on or before **Friday, August 12, 2022**.
6. The undersigned submits that this motion is made timely, in good faith, after consultation with counsel for the Plaintiff, is not interposed for purposes of delay, will result in no prejudice to Plaintiff, which consents to the relief requested, and is in the best interests of justice and judicial economy.

Respectfully submitted,

/s/ James W. Walker

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 12<sup>th</sup> day of July 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF systems which will send a notification of electronic filing (NEF) to all counsel who have appeared in this matter.

/s/ James W. Walker, Esq.

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